

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

11 CIV. 2281
CASE NO. 03MDL1570(GBD)

HON. GEORGE B. DANIELS

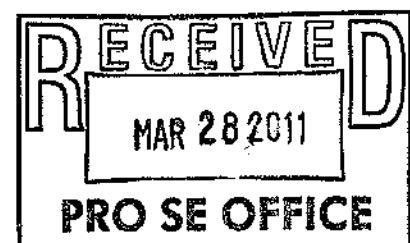
"JURY TRIAL DEMAND BY PLAINTIFF"

"PLAINTIFF SEEKS \$10,000,000 IN
DAMAGES"

IN RE: "TERRORIST ATTACKS ON SEPTEMBER 11, 2001;"

Hector Flamenco
#71956-053
FCI
Box 2000
Fort Dix, NJ 08640

THE FOLLOWING ARE DEFENDANTS AND THEIR ATTORNEYS:



- 1 Yeslam Binladin, Defendant, Pro se, Washington, DC.
- 2 For Yeslam Binladin, Defendant: James Ernest Gauch, Jones Day (DC), Washington, DC.
- 3 For Abdulrahman Bin Mahfouz, Defendant: Gerald A. Feffer, Peter Jonathan Kahn, LEAD ATTORNEYS, Williams & Connolly LLP, Washington, DC.
- 4 For African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc., Reston Investments, Inc., Safa Trust, York Foundation, Sterling Charitable Gift Fund, Muhammad Ashraf, M. Omar Ashraf, M. Yaqub Mirza, Sterling Management Group, Inc., Defendants: Christopher J. Beal, Jay D. Hanson, LEAD ATTORNEYS, DLA Piper US LLP (San Diego), San Diego, CA; John Joseph Walsh, LEAD ATTORNEY, Carter Ledyard & Milburn LLP, New York, NY; Michael D. McNeely, Steven A. Maddox, LEAD ATTORNEYS, DLA Piper US LLP(DC), Washington, DC; Nancy Luque, LEAD ATTORNEY, Luque Geragos Marino, LLP, Washington, DC; Steven Karl Barentzen, The Law Office of Steven Barentzen, Washington, DC.
- 5 For Sanabel Al-Kheer, Inc., Defendant: Christopher Canon Swindle Manning, LEAD ATTORNEY, PRO HAC VICE, Manning Sossamon, Washington, DC; John Joseph Walsh, LEAD ATTORNEY, Carter Ledyard & Milburn LLP, New York, NY; Martin Francis McMahon, LEAD ATTORNEY, Martin F. McMahon and Associates, Washington, DC; Michael D. McNeely, Steven A. Maddox, LEAD ATTORNEYS, DLA Piper US LLP(DC), Washington, DC; Nancy Luque, LEAD ATTORNEY, Luque Geragos Marino, LLP, Washington, DC.
- 6 For Mena Investments, Defendant: Christopher J. Beal, Jay D. Hanson, LEAD ATTORNEYS, DLA Piper US LLP (San Diego), San Diego, CA; John Joseph Walsh, LEAD ATTORNEY, Carter Ledyard & Milburn LLP, New York, NY.
- 7 For Sana-Bell, Inc., Defendant: Christopher J. Beal, Jay D. Hanson, LEAD ATTORNEYS, DLA Piper US LLP (San Diego), San Diego, CA; Christopher Canon Swindle Manning, LEAD ATTORNEY, PRO HAC VICE, Manning Sossamon, Washington, DC; John Joseph Walsh, LEAD ATTORNEY, Carter Ledyard & Milburn LLP, New York, NY; Martin Francis McMahon, LEAD ATTORNEY, Martin F. McMahon and Associates, Washington, DC; Michael D. McNeely, Steven A. Maddox, LEAD ATTORNEYS, DLA Piper US LLP(DC), Washington, DC; Nancy Luque, LEAD ATTORNEY, Luque Geragos Marino, LLP, Washington, DC.
- 8 For Jamal Barzinji, Al Anwa, Defendants: John Joseph Walsh, LEAD ATTORNEY, Carter Ledyard & Milburn LLP, New York, NY.
- 9 For Iqbal Unus (Yunus), Taha Jaber Al-Alwani, Defendants: Christopher J. Beal, Jay D. Hanson, LEAD ATTORNEYS, DLA Piper US LLP (San Diego), San Diego, CA; John Joseph Walsh, LEAD ATTORNEY, Carter Ledyard & Milburn LLP, New York, NY; Steven Karl Barentzen, The Law Office of Steven Barentzen, Washington, DC.
- 10 For The Republic of Iraq, Defendant: James Maggs, LEAD ATTORNEY; Timothy Brian Mills, LEAD ATTORNEY, Maggs & McDermott LLC, Washington, DC.
- 11 For Yousef Jameel, Defendant: Viet D. Dinh, LEAD ATTORNEY, Bancroft Associates, PLLC, Washington, DC.
- 12 For Taha Al Alwani, Mohammed Jaghli, Mena Corporation, Samir Salah, Abdul Hamid Abu Sulayman, Defendants: Steven Karl Barentzen, The Law Office of Steven Barentzen, Washington, DC.
- 13 For Asat Trust Reg., Defendant: Barry Coburn, Jeffrey Coffman, LEAD ATTORNEYS, PRO HAC VICE, Coburn & Coffman, PLLC, Washington, DC; David

lybcases

© 2010 Matthew Bender & Company, Inc., a member of the LexisNexis Group. All rights reserved. Use of this product is subject to the restrictions and terms and conditions of the Matthew Bender Master Agreement.

- Usher Gourevitch, LEAD ATTORNEY, Law Office of David Gourevitch, P.C., New York, NY; Lisa Freiman Fishberg, Schertler & Onorato, LLP, Washington, DC.
- 14 For Mohammed Bin Mahfouz, Defendant: Jean Engelmayer Kalicki.
- 15 For Muslim World League, also known as, Islamic World League, also known as, Rabita Al-Alam Al-Islami, Defendant: Christopher Robert Smith, Martin Francis McMahon, LEAD ATTORNEYS, Martin F. McMahon and Associates, Washington, DC; James Vann, Jason Dzubow, LEAD ATTORNEYS; Maher H. Hanania, LEAD ATTORNEY, Falls Church, VA; Michael Hadeed, LEAD ATTORNEY, Becker, Hadeed, Kellogg & Berry, Springfield, VA.
- 16 For National Commercial Bank, National Commerce Bank, Defendants: Mitchell Rand Berger, Ugo Alfredo Colella, LEAD ATTORNEYS, Ronald Stanley Liebman, Patton Boggs LLP (DC), Washington, DC.
- 17 For Suleiman Abdel Aziz Al Rajhi, Saleh Abdulaziz Al-Rajhi, Defendants: Thomas M. Melsheimer, LEAD ATTORNEY, Fish & Richardson P.C. (TX), Dallas, TX.
- 18 For Saudi American Bank, Defendant: Henry Sabath Weisburg, LEAD ATTORNEY, Brian Howard Polovoy, Shearman & Sterling LLP (NY), New York, NY.
- 19 For Al Baraka Investment and Development Corporation, also known as Al Baraka Bank, also known as Dallah Albaraka Group, LLC, Al Baraka Investment & Development Corp, Defendants: James Vann, Jason Dzubow, LEAD ATTORNEYS; Martin Francis McMahon, Martin F. McMahon and Associates, Washington, DC.
- 20 For Faisal Islamic Bank, Defendant: Hugh D Higgins, LEAD ATTORNEY, PRO HAC VICE, Lauro Law Firm, Tampa, FL; John F. Lauro, LEAD ATTORNEY, Lauro Law Firm, Tampa, FL; Lisa Beth Hymes, Lisa B. Hymes, Esq., Armonk, NY.
- 21 For Success Foundation, Inc., Mohamed S. Omeish, Defendants: Michael Hadeed, LEAD ATTORNEY, Becker, Hadeed, Kellogg & Berry, Springfield, VA.
- 22 For Abdurahman Alamoudi, Defendant: Maher Hana Hanania, Sr, Hanania & Kheder, P.C., Falls Church, VA.
- 23 For Sulaiman Al-Ali, Abdullah M. Al-Mahdi, Abdul Al-Moslah, Al Haramain Foundation, Aqeel Al-Aqeel, Mohammed Jamal Khalifa, Adel Abdul Batterjee, Islamic Assembly of North America, Defendants: Ashraf Wajih Nubani, Busch & Nubani, P.C., Annandale, VA.
- 24 For Abdullah Bin Saleh Al Obaid, Perouz Seda Ghaty, Abdullah Bin Saleh Al-Obaid, Saudi Red Crescent, Salman Al-Ouda, Defendants: Alan Robert Kabat, Bernabie and Katz PLLC (DC), Washington, DC.
- 25 For Ahmed Totonji, Defendant: George R. Blakey, LEAD ATTORNEY, Notre Dame, IN; Steven Karl Barentzen, The Law Office of Steven Barentzen, Washington, DC.
- 26 For Iqbal Yunus, Defendant: John Joseph Walsh, LEAD ATTORNEY, Carter Ledyard & Milburn LLP, New York, NY; Michael D. McNeely, Steven A. Maddox, LEAD ATTORNEYS, DLA Piper US LLP(DC), Washington, DC; Nancy Luque, LEAD ATTORNEY, Luque Geragos Marino, LLP, Washington, DC; Steven Karl Barentzen, The Law Office of Steven Barentzen, Washington, DC.
- 27 For Jamal Barzinji, Defendant: Christopher J. Beal, Jay D. Hanson, LEAD ATTORNEYS, DLA Piper US LLP (San Diego), San Diego, CA; Steven Karl Barentzen, The Law Office of Steven Barentzen, Washington, DC.

lybcases

© 2010 Matthew Bender & Company, Inc., a member of the LexisNexis Group. All rights reserved. Use of this product is subject to the restrictions and terms and conditions of the Matthew Bender Master Agreement.

- 28..... For Tarik Hamdi, Defendant: Maher H. Hanania, LEAD ATTORNEY, Falls Church, VA; Maher Hana Hanania, Sr, Hanania & Kheder, P.C., Falls Church, VA.
- 29..... For Aradi, Inc., Defendant: Raymond Richard Castello, LEAD ATTORNEY, Fish & Richardson P.C., New York, NY.
- 30..... For Mar-Jac Poultry Inc, Defendant: Wilmer Parker, III, LEAD ATTORNEY, Gillen Parker and Withers LLC, Atlanta, GA.
- 31..... For Rabita Trust, International Islamic Relief Organization(IIRO), also known as Islamic Relief Organization, also known as International Relief Organization, also known as Success Foundation, Wa'el Hamza Julaidan, also known as Al Hasan Al Madani, Defendants: James Vann, LEAD ATTORNEY; Martin Francis McMahon, LEAD ATTORNEY, Martin F. McMahon and Associates, Washington, DC.
- 32..... For Al Haramain Islamic Foundation, Inc., Shahir Abdulraoof Batterjee, Abdul Rahman Al Swailem, Abdullah Omar Naseef, Abdulla Al Obaid, Abdullah Muhsen Al Turki, (Al Turki), Talal Mohammed Badkook, Red Crescent Saudi Committee, Adnan Basha, Safar Al-Hawali, Sheik Hamad Al-Husaini, Mohammed Ali Sayed Mushayt, Mushayt for Trading Company, Saleh Al-Hussayen, Sheik Salman Al-Oawdah, Sulaiman Al-Alsheikh, Sulaiman Ali Eldeen, Sanur Salah, Proyectos Promociones Paradaus S.I., Republic of Sudan Ministry of Interior, Defendants: Alan Robert Kabat, Lynne A. Bernabel, LEAD ATTORNEYS, Bernabie and Katz PLLC (DC), Washington, DC.
- 33..... For Soliman H.S. Al-Buthe, Defendant: Alan Robert Kabat, LEAD ATTORNEY, Bernabie and Katz PLLC (DC), Washington, DC.
- 34..... For Zahir H. Kazmi, Defendant: Jonathan Marc Cooper.
- 35..... For Wamy International, Inc., Defendant: Omar T. Mohammedi, O'Bryan Baun Choen Cuebler Karamanian, Birmingham, MI.
- 36..... For Abdullah Bin Laden, Defendant: James Ernest Gauch, LEAD ATTORNEY.
- 37..... For Saleh Abdullah Kamel, Defendant: Christopher Robert Smith, Martin Francis McMahon, LEAD ATTORNEYS, Martin F. McMahon and Associates, Washington, DC; James Vann, Jason Dzubow, LEAD ATTORNEY.
- 38..... For Sulaiman Bin Abdul Aziz Al Rajhi, Saleh Abdul Aziz Al Rajhi, Abdullah Salaiman Al-Rajhi, Defendant: John M. Helms, JR., Thomas M. Melsheimer, Fish & Richardson P.C. (TX), Dallas, TX; Matthew E. Yarbrough, Fish & Richardson, P.C., Dallas, TX; Raymond Richard Castello, Fish & Richardson P.C., New York, NY.
- 39..... For Wa'el Hamza Jalaidan, Defendant: Martin Francis McMahon, Martin F. McMahon and Associates, Washington, DC.
- 40..... For Omar Abdullah Kamel, Defendant: Christopher Robert Smith, Martin Francis McMahon, LEAD ATTORNEYS, Martin F. McMahon and Associates, Washington, DC; Jason Dzubow, LEAD ATTORNEY.
- 41..... For Dallah Al Baraka Group LLC, Tadamon Islamic Bank, Dallah Avco Trans Arabia Co. LTD., Aqsa Islamic Bank, Al Shamal Islamic Bank, also known as, Shamel Bank, also known as Bank El Shamar, Saleh Abdullah kamel, Al-Baraka Bancorp, Inc., Defendants: Martin Francis McMahon, LEAD ATTORNEY, Martin F. McMahon and Associates, Washington, DC.
- 42..... For Mohammed Bin Abdulrahman Al Ariefy, Faisal Group Holding Co., Alfaisaliah Group, Abdullah Al Faisal Bin Abdulaziz Al Saud, Addullah Al Faisal Abdulaziz Al Saud, Defendants: T. Barry Kingham, Curtis, Mallet-Prevost, Colt and Mosle LLP, New York, NY.
- 43..... For Saudi High Commission, The Saudi High Relief

Iybcases

© 2010 Matthew Bender & Company, Inc., a member of the LexisNexis Group. All rights reserved. Use of this product is subject to the restrictions and terms and conditions of the Matthew Bender Master Agreement.

Commission, Defendant: Alan E. Untereiner, Max Huffman, Roy T. Englert, Jr., LEAD ATTORNEYS, Robbins, Russell, Englert, Orseck & Untereiner, L.L.P., Washington, DC; Lawrence Saul Robbins, Robbins Russell Englert Orseck Untereiner & Sauber, LLP, Washington, DC.

- 44 For Ibrahim Bin Abdul Aziz Al Ibrahim Foundation, Daral Maal Al Islami Trust, Abdul Aziz Al-Ibrahim, Defendants: James Joseph McGuire, Sheppard, Mullin, Richter & Hampton, LLP (NYC), New York, NY.
- 45 For Bakr M Bin Laden, Defendant: Stephen Joseph Brogan, LEAD ATTORNEY, Jones Day (DC), Washington, DC; Melissa Danielle Stear.
- 46 For Tarek M. Bin Laden, Omar M. Bin Laden, Defendants: Melissa Danielle Stear.
- 47 For SNCB Corporate Finance Ltd., SNCB Securities Ltd. in London, Defendants: Ronald Stanley Liebman, Patton Boggs LLP (DC), Washington, DC.
- 48 For Wa'el Jalaidan, Defendant: Christopher Robert Smith, Martin Francis McMahon, LEAD ATTORNEYS, Martin F. McMahon and Associates, Washington, DC.
- 49 For Saudi Joint Relief Committee, Defendant: Colin S. Stretch, LEAD ATTORNEY, William David Sarratt, Kellogg, Huber, Hansen, Todd, Evans & Figel, PLLC (DC), Washington, DC; Mark Charles Hansen, Michael K. Kellogg, LEAD ATTORNEYS.
- 50 For Habib Faris Abdullah Al-Mamouri, Defendant: Habib Faris Abdullah Al-Mamouri, LEAD ATTORNEY.
- 51 For Dar Al Maal Al Islami, Defendant: Al Shamal Islamic Bank, LEAD ATTORNEY; James Joseph McGuire, LEAD ATTORNEY, Mishcon de Reya New York, LLP, New York, NY.
- 52 For Makkah mukarrahman Charity Trust, Inc., Defendant: Martin Francis McMahon, LEAD ATTORNEY, Martin F. McMahon and Associates, Washington, DC; William Horace Jeffress, Jr.
- 53 For Republic of Sudan Ministry of Defense, Defendant: Matthew H. Kirtland, LEAD ATTORNEY, Fulbright & Jaworski, L.L.P., Washington, DC.
- 54 For Nimir Petroleum LLC, Defendant: Felice Beth Galant, LEAD ATTORNEY, Fulbright & Jaworski L.L.P., New York, NY; Matthew H. Kirtland, LEAD ATTORNEY, Fulbright & Jaworski, L.L.P., Washington, DC.
- 55 For Mounir Al Motassadeq, Talobah International Aid Association, Dr. Abdulrahman Al-Amoudi, Mohammed Hussein Al Ibrahim, Mohammed Hussein Al-Amoudi, Defendants: Maher H. Hanania, LEAD ATTORNEY, Falls Church, VA.
- 56 For Aqeel Al Aqeel, Saleh O. Badahdah, Defendants: Maher H. Hanania, LEAD ATTORNEY, Falls Church, VA; Ashraf Wajih Nubani, Busch & Nubani, P.C., Annandale, VA.
- 57 For Arab Bank, Defendant: Richard T. Marooney, Jr, King & Spalding LLP (NYC), New York, NY.
- 58 For Abdul Rahman Bin Kahlid Bin Mahfouz, Defendant: Alan Kahn, LEAD ATTORNEY, Res., New York, NY; Thomas Viles, LEAD ATTORNEY, Berkman Henoch Peterson & Peddy, P.C., Garden City, NY; Peter Jonathan Kahn, Williams & Connolly LLP, Washington, DC.
- 59 For World Assembly of Muslim Youth, also known as Wamy International, Inc., also known as World Association for Muslim Youth, Defendant: Khurram Basir Wahid, LEAD ATTORNEY, Wahid Vizcaino & Maher, LLP(NYC), New York, NY; Maher H. Hanania, LEAD ATTORNEY, Falls Church, VA; Omar T. Mohammedi, O'Bryan

lybcases

© 2010 Matthew Bender & Company, Inc., a member of the LexisNexis Group. All rights reserved. Use of this product is subject to the restrictions and terms and conditions of the Matthew Bender Master Agreement.

- Baun Choen Cuebler Karamanian, Birmingham, MI.
- 60..... For Mohammed Bin Abdullah Al-Jomaith, Defendant: Christopher Talbott Lutz, LEAD ATTORNEY; Christopher Talbot Lutz, Roger E. Warin, LEAD ATTORNEY, Steptoe & Johnson, L.L.P., Washington, DC.
- 61..... For Salahuddin Abduljawad, Defendant: John C. Millian, LEAD ATTORNEY, Gibson, Dunn & Crutcher, L.L.P., Washington, DC.
- 62..... For Wael Jalaidan, Defendant: Martin Francis McMahon, LEAD ATTORNEY, Martin Francis McMahon, Martin F. McMahon and Associates, Washington, DC.
- 63..... For Sami Omar Al-Hussayen, Defendant: David Z. Nevin, Scott McKay, LEAD ATTORNEYS, Nevin, Benjamin & McKay LLP, Boise, ID; Joshua Lewis Dratel, Law Offices of Joshua L. Dratel, P.C., New York, NY.
- 64..... For Ahmed Zaki Yamani, Defendant: Rayner Max Hamilton, LEAD ATTORNEY, White & Case LLP (NY), New York, NY.
- 65..... For Yassin Abdullah Kadi, Defendant: Bonnie K. Arthur, David F. Geneson, LEAD ATTORNEY, Hunton & Williams LLP (DC), Washington, DC.
- 66..... For Daral Maal Al Islami Trust, Defendant: James Joseph McGuire, LEAD ATTORNEY, Sheppard, Mullin, Richter & Hampton, LLP (NYC), New York, NY.
- 67..... For Salman Bin Abdulaziz Al Saud, Defendant: William Horace Jeffress, Jr.
- 68..... For Omar Bin Laden, Defendant: Jones Day, LEAD ATTORNEY, Washington, DC.
- 69..... For Naif Bin Abdulaziz Al Saud, Defendant: Christopher R. Cooper, Jamie Steven Kilberg, Sara Elizabeth Kropf, William Horace Jeffress, Jr.
- 70..... For Guld and African Center, Defendant: Ba Taqwa For Commerce an Real Estate Company Limit, LEAD ATTORNEY.
- 71..... For Saudi Binladin Group, Inc., Defendant: Mary Ellen Powers, LEAD ATTORNEY, Jones Day (DC), Washington, DC; Melissa Danielle Stear.
- 72..... For Dubai Islamic Bank, Defendant: Frank Christian Welzer, LEAD ATTORNEY, Zukerman Gore, Brandeis & Crossman, LLP, New York, NY.
- 73..... For National Commercial Bank of Saudi Arabia, Defendant: Mitchell Rand Berger, LEAD ATTORNEY, Ronald Stanley Liebman, Patton Boggs LLP (DC), Washington, DC.
- 74..... For Sheikh Yusuf Al Qardawi, Defendant: Amy Rothstein, LEAD ATTORNEY, Doar, Rieck, Kaley & Mack, New York, NY.
- 75..... For Schreiber & Zindel, Frank Zindel, Engelbert Schreiber, Engelbert Schreiber, Jr, Defendant: Ayad P. Jacob, LEAD ATTORNEY, Schiff Hardin LLP (Chicago), Chicago, IL; Donald Allen Klein, LEAD ATTORNEY, Schiff Hardin LLP, New York, NY; John N. Scholnick, LEAD ATTORNEY, Neal, Gerber & Eisenberg, Chicago, IL.
- 76..... For Martin Watcher, Erwin Watcher, Defendant: David Usher Gourevitch, Law Office of David Gourevitch, P.C, New York, NY; Lisa Freiman Fishberg, Schertler & Onorato, LLP, Washington, DC.
- 77..... For Sercor Treuhand Anstalt, Defendant: Barry Coburn, Jeffrey Coffman, LEAD ATTORNEYS, PRO HAC VICE, Coburn & Coffman, PLLC, Washington, DC; David Usher Gourevitch, Law Office of David Gourevitch, P.C, New York, NY; Lisa Freiman Fishberg, Schertler & Onorato, LLP, Washington, DC.
- 78..... For Metalor, Defendant: David M. Ryan, LEAD ATTORNEY, Nixon Peabody LLP (MA), Boston, MA.

lybcases

9

© 2010 Matthew Bender & Company, Inc., a member of the LexisNexis Group. All rights reserved. Use of this product is subject to the restrictions and terms and conditions of the Matthew Bender Master Agreement.

- 79..... For Banca Del Gottardo, Defendant: Martin Jeffrey Schwartz, Monica Pa, LEAD ATTORNEY,,Sonnenschein Nath & Rosenthal LLP (NY), New York, NY.
- 80..... For Al Baraka Investment & Development Corp., Defendant: James Vann, Jason Dzubow, LEAD ATTORNEYS; Martin Francis McMahon, Martin F. McMahon and Associates, Washington, DC.
- 81..... For Islamic Investment Company of the Gulf (Sharjah), Defendant: James Joseph McGuire, Sheppard, Mullin, Richter & Hampton, LLP (NYC), New York, NY; Timothy James McCarthy.
- 82..... For Cherif Sedky, Defendant: Karla J. Letsche, LEAD ATTORNEY, Oldaker,Biden & Belair, LLP, Washington, DC.
- 83..... For Mohammad Abdullah Aljomaih, Defendant: Anthony Louis Cotroneo, Rosner, Nocera & Ragone, LLP, NY, NY.
- 84..... For Mohammed Hussein Al Amoudi, Defendant: James Edward d'Auguste, Akin Gump Strauss Hauer & Feld LLP(CA), Los Angeles, CA; Mara Beth Zusman, Mark Joseph MacDougall, Nicole Hagenbach Sprinzen, Akin, Gump, Strauss, Hauer & Feld, LLP (DC), Washington, DC.
- 85..... For Prince Mohamed Al-Faisal Al-Saud, Defendant: Tracey Cote Allen, LEAD ATTORNEY.
- 86..... For Council on American-Islamic Relations (CAIR), Defendant: Omar T. Mohammedi, LEAD ATTORNEY, O'Bryan Baun Choen Cuebler Karamanian, Birmingham, MI.
- 87..... For Martin Wachter, Erwin Wachter, Defendant: Barry Coburn, Jeffrey Coffman, LEAD ATTORNEYS, PRO HAC VICE, Coburn & Coffman, PLLC, Washington, DC.
- 88..... For Abdullah Bin Khalid Al-Thani, Defendant: Rachel Tausend, Sheldon Krantz, LEAD ATTORNEY, DLA Piper US LLP (NY), New York, NY; David Eli Nachman, LEAD ATTORNEY, DLA Piper US LLP (NY), New York, NY.
- 90..... For Sana-Bell, Inc., Defendant: Christopher Canon Swindle Manning, LEAD ATTORNEY, PRO HAC VICE, Manning Sossamon, Washington, DC; Eurydice Aliferis Kelley, Rottenberg Lipman Rich, P.C., New York, NY; Martin Francis McMahon, Martin F. McMahon and Associates, Washington, DC.
- 91..... For Sanabel Al Kheer, Inc., Defendant: Christopher Canon Swindle Manning, LEAD ATTORNEY, PRO HAC VICE, Manning Sossamon, Washington, DC; Eurydice Aliferis Kelley, Rottenberg Lipman Rich, P.C., New York, NY.
- 92..... For The Royal Embassy of Saudi Arabia, Ahmed A. Kattan, Abdul Rahman I. Al-Noah, Movant: Mark Charles Hansen.
- 93..... For Lynn Faulkner, Intervenor Defendant: James F. Peterson, Paul J. Orfanedes. LEAD ATTORNEYS. Washinton. DC

COMPLAINT

1. Now comes Hector Flamenco, Plaintiff, and complaining against Defendants as stated herein:

2. That Plaintiff moves this Honorable Court to-- (i) set a trial date; and (ii) award Plaintiff ten-million dollars (\$10,000,000.00) in damages, plus costs and attorney fees as a result of this complaint.

3. That Plaintiff is currently incarcerated at Federal Correction Institution, Fort Dix, New Jersey.

4. Plaintiff seeks to hold all Defendants who aided, abetted, sponsored, conspired to sponsor, financed, or otherwise provided material support to Osama bin Laden and the terrorist organization al Qaeda, liable for the physical destruction, mental anguish, loss of enjoyment, emotional distress, health problems, death, and injuries suffered by Plaintiff as a result of the terrorist attacks of September 11, 2001. Plaintiff maintains that the responsibility for the acts of international terrorism, perpetrated against the United States and its citizens, rests not only with Osama bin Laden, al Qaeda, and the nineteen hijackers but also with the multitude of those who made it possible for the terrorist attacks to occur, as a result of the financial and other material support they provided to al Qaeda.

5. The birth of al Qaeda as a terrorist organization occurred in the late 1980's. Al Qaeda (Arabic meaning "Foundation") was intended to serve as a foundation upon which to build an Islamic global army. By working with allied terrorist groups with similar ideological views and anti-American sentiments, al Qaeda launched a global jihad. Plaintiff maintains that al Qaeda relied on a worldwide network of banks, financial institutions, governments and their officials, charities, non-profit

organizations, businesses, and individuals financiers, who conspired to generate, launder, transfer and ultimately provide financial and other material support to al Qaeda, in order to sponsor its terrorist activities. Charities play a key role in terrorist financing. Under the guise of providing humanitarian aid, a legion of charities divert, to al Qaeda, the wealth of charitable donations they amass from both witting and unwitting donors.

6. Plaintiff claims that, since at least the mid-1990's, Osama bin Laden and al Qaeda have publicly proclaimed that the United States was one of the primary targets of al Qaeda's global jihad, and have called for the killing of Americans whenever and wherever they may be found. Plaintiff therefore contends that all ^(Defendants) those who provided material support to al Qaeda, from at least the mid-1990's onwards, have thereby knowingly participated in al Qaeda's global conspiracy to commit terrorist attacks against the United States, of which the September 11th attacks were an intended and foreseeable result. At the time of the 9/11 terrorist attacks, al Qaeda had at its disposal an annual income of approximately fifty million dollars, and assets, accumulated over a ten year period, of approximately three hundred to five hundred million dollars. Plaintiff maintains that, absent the material support provided by Defendants, al Qaeda would not have possessed the financial resources, physical assets, membership base, technological knowledge, communication skills, and global reach required to conceive, plan, and execute a terrorist attack on such a massive scale, as those committed on September 11, 2001. It is said Defendants that provided al Qaeda with the means to recruit, train, and employ thousands of terrorists, including the twenty assigned to murder United States citizens and destroy United States landmarks on 9/11.

7. In the months following September 11, 2001, Plaintiff and thousands of workers participated in New York City's effort to clean up the vast destruction caused by terrorists and the Defendants. The Defendants supported the terrorists, al Qaeda, i.e. to fly airplanes and crash them into the World Trade Center, resulting in many explosions, acres of twisted metal, crumbled concrete, and harmful noxious dust, that blanketed the rubble and hung in the air for weeks, producing and acrid smell through downtown Manhattan. Plaintiff and those who helped in the search and rescue operations, and in the effort to clear mountains of debris, had to breathe this harmful dust in the air as they and Plaintiff worked.

8. That on or about September 23, 2001, Plaintiff started to work at the World Trade Center Disaster Site, in the "Hole," Cleaning up the mess that Defendants caused. The "Hole," is where the building fell down. Plaintiff picked up debris in the "Hole," that included but not limited to: everything that was in the "Hole," pipes, beams, steel, metal, broken concrete, wire, bricks, soil, glass, burning debris, office equipment, ash, electrical fixtures, heating units, tiles, asbestos on the pipes, liquids of all types that were hot and cold, air conditioning units, ceiling tiles, plastics, cloths, shoes, human body parts, such as legs, arms, hands, feet, fingers, heads, torsos,

all different types of sizes of human body parts, meaning that everything that was in the World Trade Center that ended up crushed on the ground, in the "Hole," Plaintiff worked to pick it up.

9. That Plaintiff worked at the World Trade Center Disaster Site for about 6-months, 6 or 7-days a week, with overtime, employed by Tully Const. Inc. 20

10. That during the six-months of Plaintiff's work period at the WTC. Plaintiff breathed in asbestos dust, harmful chemical dusts, burning plastics, chemical smoke fumes, all caused by Defendants, that has now caused Plaintiff serious injuries, such as but not limited to: emphysema, reactive airways, dysfunction, chronic, rhinosinusitis, gastroesophageal, esophagus, gastritis, ulcers, shortness of breath, wezzing, nausea, stomach problems, sleeping disorder, concentrating problems, posttraumatic stress disorder (PTSD), sinus problems, skin rashes, eye vision problems, loss of smell, signs of lung & throat cancers. Plaintiff being part of the search, rescue and clean up of the WTC Disaster Site, witnessed and participated in the removal of many human remains, death and the smell of death in the air, that was again breathed in by Plaintiff, that Defendant's caused, where now Plaintiff has suffered loss of enjoyment, mental anguish, nightmares, and other related mental problems.

11. That on or about March 15, 2010, Plaintiff was seen by FCI-Fort Dix, medical staff, that diagnosed Plaintiff with said injuries, and prescribed many medications, such as, but not limited to: polycarbophil, betametnasone, omeprazole, calcipotriene, cromolyn, fluticasone, albuterol inhaler HFA (6.7. GM) 90mcg.

12. That on or about February 15, 2008, Plaintiff was incarcerated at Nassau County Jail, New York, and that Plaintiff was seen by Nassau County Medical Center, medical staff, that diagnosed Plaintiff with said injuries, and prescribed many medications.

13. That on or about September 21, 2010, Plaintiff became aware that said injuries were a result of cleaning up the mess at the WTC Disaster Site, caused by Defendants, and breathing in said dust, fumes and smoke, again all caused by the Defendants.

14. That Defendants created massive clouds of hazardous dust, smoke fumes that were breathed in by Plaintiff while working at the WTC Disaster Site, that has caused Plaintiff's said injuries.

15. That Defendant had a duty, i.e., to not support al Qaeda plan to crash air-planes into the WTC, and a duty, i.e., to not allow the destruction that followed of the WTC Building crashing down and causing said dusts, chemical smoke fumes, and deaths. All Defendants have breached this duty and is also deemed as acts of negligence.

16. That said hazardous dusts landed and settled on Plaintiff's skin and eyes while working at the WTC Disaster Site, and that said dusts were absorbed into Plaintiff's eyes, skin pores, which further resulted and amplified the cause of Plaintiff's injuries, and again caused by Defendants.

17. That Plaintiff suffers on a daily basis from said injuries that were caused by Defendants.

18. WHEREFORE, Plaintiff prays that this Honorable Court enters an ORDER for a Jury Trial and awards Plaintiff \$10,000,000.00 in damages, plus costs and attorney fees.

Respectfully Submitted,


Hector Flamenco

March 24 , 2011

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE NO. 03MDL1570(GBD)

HON. GEORGE B. DANIELS

IN RE: "TERRORIST ATTACKS ON SEPTEMBER 11, 2001;"

Hector Flamenco
#71956-053
FCI
Box 2000
Fort Dix, NJ 08640

See Complaint for list of Defendants;
and their attorneys; _____/

EX PARTE MOTION
FOR THIS COURT TO ORDER THE COURT CLERK OR PROCESS SERVER AND OR OTHERS
TO SERVE PLAINTIFF'S COMPLAINT UPON ALL DEFENDANTS'; AND MOTION TO PROCEED
IN FORMA PAUPERIS, PURSUANT TO FEDERAL CIVIL RULES 4 & 4.1, AND THE LOCAL
RULES OF THIS COURT

Now comes Hector Flamenco, Plaintiff-Sui Juris, and moves this Honorable Court to ORDER the Court Clerk or Process Server and or others to serve Plaintiff's complaint upon all Defendants, and to allow Plaintiff to proceed in forma pauperis, pursuant to Federal Civil Rules 4 & 4.1, and the Local Rules of this Court, as stated herein:

There are almost 100 Defendants' in this case, and that Plaintiff is incarcerated, and that Plaintiff is indigent and can not afford to pay for all copies, postage, filing fees, and process server fees of the Sommons, thus, it is impossible for Plaintiff to serve all Defendants. Therefore, in the interest of justice, this Court should grant this motion in favor of Plaintiff.

Respectfully Submitted,

Hector Flamenco March 24 , 2011
Hector Flamenco